



DEC 17 2004

GSA Office of the Chief Acquisition Officer

MEMORANDUM FOR RONALD POUSSARD
DIRECTOR
DEFENSE ACQUISITION REGULATIONS COUNCIL

FROM: RALPH DESTEFANO, DIRECTOR
REGULATORY AND FEDERAL ASSISTANCE
PUBLICATIONS DIVISION

SUBJECT: FAR Case 2003-025, Telecommuting for Federal Contractors

Attached are comments received on the subject FAR case published at 69 FR 59701; October 5, 2004. The comment closing date was December 6, 2004.

<u>Response Number</u>	<u>Date Received</u>	<u>Comment Date</u>	<u>Commenter</u>
2003-025-1	10/12/04	10/12/04	UCN, Inc.
2003-025-2	10/17/04	10/17/04	Judith A. Turner
2003-025-3	10/19/04	10/19/04	Turner Consulting Group
2003-025-4	10/20/04	10/20/04	John (Jack) Gocek

Attachments

2003-025-1



Group_Erulemaking@epamail.epa.gov
Sent by:
Moghis.Asfara@epamail.epa.gov

To: farcase.2003-025@gsa.gov
cc: Group_Erulemaking@epamail.epa.gov
Subject: Docket Comments - October 05, 2004

10/12/2004 11:18 AM

Greetings from the Regulations.gov website!

As part of our public service to increase participation in federal government regulatory activities, the federal government's central online rulemaking portal, Regulations.Gov, accepts public comments on federal agency rulemakings open for public comment and transmits these comments once per day to the proper agency.

This message transmits public comments and related documentation submitted on your agency's rulemakings through the Regulations.Gov website. Comment files and attachments have been compressed into a zip file to ease transmission through agency e-mail systems. An Unzip program will be required to extract the attached files.

Please distribute these comments to the appropriate rulemaking dockets.

If you have questions, please send e-mail to:
comments@comments.regulations.gov.

Thank You!



(See attached file: NASA-04-22246-100504.zip) NASA-04-22246-100504.z

2003-025-1

Agency : NATIONAL AERONAUTICS AND SPACE ADMINISTRATION

Title : Federal Acquisition Regulation; Telecommuting for Federal Contractors

Subject Category : Federal Acquisition Regulation (FAR): Federal Acquisition Regulation (FAR): Federal Acquisition Regulation (FAR): Telecommuting for Federal contractors Telecommuting for Federal contractors Telecommuting for Federal contractors

Docket ID : 9000-AK03

CFR Citation : 48 CFR 7, 11, 13, 15

Published : October 05, 2004

Comments Due : December 06, 2004

Phase : RULES

Your comment has been sent. To verify that this agency has received your comment, please contact the agency directly. If you wish to retain a copy of your comment, print out a copy of this document for you

Please note your REGULATIONS.GOV number.

Regulations.gov #: EREG - 1 Submitted Oct 05, 2004

Author : Ms. Jan Johnson

Organization : UCN, Inc.

Mailing Address :

Attached Files :

Comment : We want to inform the government that there are adequate technologies now available to support the telecommuting of lower level employees involved in the general business of citizen contact - answering standard questions, fielding questions and routing calls to appropriate others - in basic front line citizen service/support type functions. These technologies enable real-time, random monitoring of calls, provide real-time reporting on who is logged in for work, who is available for calls, how many calls are in queue on hold, in process; the employees can be dispersed across the US enabling contractors to hire in lower-cost areas of the countries, thus reducing budget requirements. The use of available features to managed remotely and to automatically survey the callers' experience immediately, thus producing near real-time trends on satisfaction level: provided by the agency - all of these features are available today on a pay-as-you-go basis.

We encourage the agency to take this regulation one step further and to incentivize suppliers who take the initiative to hire telecommuting contractors, since this practice reduces human concentration in centralized locations, reduces oil consumption by eliminating the commute, and provides an avenue for the agency to reduce costs because the agency does not have to house employees in its facilities, in addition it provides access workers in lower-cost areas of the countries.

2003-025-2



"Judith A. Turner
(TCG)"
<judith.turner@tcg.co
m>

To: farcase.2003-025@gsa.gov
cc:
Subject: FAC 2001-25, FAR case 2003-025

10/17/2004 10:37 PM

To Whom It May Concern:

I am writing to express my support for FAC 2001-25, FAR case 2003-025, Authorization of Telecommuting for Federal Contractors.

I believe, however, that the rule does not go far enough. The section that says "unless the contracting officer determines that the requirements of the agency, including security requirements, cannot be met if telecommuting is permitted," is big enough to drive a truck through.

The reasons are these:

- 1) Government contracts are typically not performance-based contracts. In fact, too many of them are contracts for people, and not performance.
- 2) Government managers typically do not know how to manage telecommuters. They believe that people who cannot be watched will not work; they believe that presence means production.
- 3) Government managers typically think that security is inherently physical: if the computer or the desk is inside the building, it is safer than it is if it is outside the building.

Therefore, I think it is important to add a requirement that telecommuting be established as a *requirement* for some percentage of government contracts, and that telecommuting be defined as working offsite for 25 or more hours a week. (Today some government agencies claim credit for allowing telecommuting if someone works from home one *day* a year.)

To make that work, I think it is important that government managers (and contract officers) who let contracts to businesses that telecommute be given additional training, additional funds, and a leg up on promotion to encourage them to change. Without a carrot, there will be no change, because managing telecommuters is different from managing on-site employees, and means that managers have to manage differently.

(I won't go into the reasons that this belief about managing differently is just plain wrong, but instead offer this parable: A government manager asked how a telecommuting manager knew that her staff was working when she could not see them. She asked how the government manager knew his staff was working when he could. The moral of the story is that management must always be based on output, and not seatput -- the application of one's seat to the chair.)

In short, then, I applaud your new regulation, and urge you to go further.

--Judith A. Turner
2869 McGill Terrace N.W.
Washington, DC 20008

2003-025-3



Group_Erulemaking@epamail.epa.gov
Sent by:
Moghis.Asfara@epamail.epa.gov

To: farcase.2003-025@gsa.gov
cc: Group_Erulemaking@epamail.epa.gov
Subject: Docket Comments - October 18, 2004

10/19/2004 08:15 AM

Greetings from the Regulations.gov website!

As part of our public service to increase participation in federal government regulatory activities, the federal government's central online rulemaking portal, Regulations.Gov, accepts public comments on federal agency rulemakings open for public comment and transmits these comments once per day to the proper agency.

This message transmits public comments and related documentation submitted on your agency's rulemakings through the Regulations.Gov website. Comment files and attachments have been compressed into a zip file to ease transmission through agency e-mail systems. An Unzip program will be required to extract the attached files.

Please distribute these comments to the appropriate rulemaking dockets.

If you have questions, please send e-mail to:
comments@comments.regulations.gov.

Thank You!



(See attached file: NASA-04-22246-101804.zip) NASA-04-22246-101804.z

2003-025-3

Agency : NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
Title : Federal Acquisition Regulation; Telecommuting for Federal Contractors
Subject Category : Federal Acquisition Regulation (FAR): Federal Acquisition Regulation (FAR): Federal Acquisition Regulation (FAR): Telecommuting for Federal contractors Telecommuting for Federal contractors Telecommuting for Federal contractors
Docket ID : 9000-AK03
CFR Citation : 48 CFR 7, 11, 13, 15
Published : October 05, 2004
Comments Due : December 06, 2004
Phase : RULES

Your comment has been sent. To verify that this agency has received your comment, please contact the agency directly. If you wish to retain a copy of your comment, print out a copy of this document for you

Please note your REGULATIONS.GOV number.

Regulations.gov #: EREG - 2 Submitted Oct 18, 2004

Author : Mr. Daniel Turner

Organization : Turner Consulting Group

Mailing Address :

Attached Files :

Comment : I have a contracting company. We've been trying to get our clients to let us telecommute for 10 years. Sometimes they say OK; sometimes they fire us because they can't see us and that makes them think we're not working.

The reality is that when people work from home, they're far more productive. We've seen gains of over 100%. Our evaluation of the workplace is that in the majority of them, employees get only about 3-4 hours of real work done per day. There are too many distractions - smells, coworkers stopping by, coffee, lunch, etc. When at home we get 6.5-7.5 hours of actual work in an 8-hour day. That's an amazing difference

This regulation, though it really needs an evaluation of the excuses COTRs give to determine whether they're legitimate or just stupid, will go a long way towards making the government better at dealing with telecommuters. In addition, it will save the government a fortune on office space, and will encourage the government to be more hands-off on contracts. Currently, because contractors are required to be on-site most of the time, the government feels like it can interject its own opinion of the way things should be done. This is contrary to performance-based contracting, which all government agencies are supposed to be promoting.

Some COTRs will complain about on-site vs. off-site costs. In my opinion, contractors should be required to make the costs the *same* (or within, say, 1%). That way there will be no cost difference. And the reality is that the cost is nearly identical, except you can pay people less when they're telecommuters. They don't have to spend 2 h

2003-025-3

a day commuting, and that alone saves them 20% of their time. So, pay them 20%
Such a deal!

So, in a nutshell:

1. GREAT regulation.
 2. Create a vetting procedure for incoming requests for ignoring the regulation.
 3. Don't let contracting officers get too many passes on the regulation. Hold their f
the fire!
 4. This'll save the government a fortune.
-

2003-025-4



"John (Jack) Gocek"
<GHOST.RIDER@ERO
LS.COM>

To: farcase.2003-025@gsa.gov
cc:
Subject: FAC 2001-25, FAR

10/20/2004 06:54 PM

I support this change to allow Federal Contractors to work from home.

We hear over and over how the government wants to cut pollution, reduce our use of oil and reduce traffic yet it does not, in most cases, let a significant part of its workforce work from home at least a couple of days a week.

Taking this action would at least be a step in the right direction and also set an example to companies that have not yet adopted such a policy.

Thank you for your time.